

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

PACIFIC PREMIER BANK,
Plaintiff,

vs.

GROUP MIDLAND HOTELS, LLC, and
CHETNA HIRA,
Defendants.

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CIVIL ACTION NO. 3:17-CV-00312-B

PLAINTIFF PACIFIC PREMIER BANK’S MOTION FOR SUMMARY JUDGMENT

Plaintiff Pacific Premier Bank (“Plaintiff” or “PPB”) files this Motion for Summary Judgment (the “Motion”) against Chetna Hira (“Defendant” or “Hira”) in accordance with Rule 56 of the Federal Rules of Civil Procedure.

PPB presents the following issues for summary judgment:

1. In this Motion, PPB seeks summary judgment on its claim to recover on a guaranty that Hira executed in favor of PPB.
2. PPB is entitled to summary judgment against Hira because PPB can prove each element of its claim for breach of guaranty. *See* FED. R. CIV. P. 56(a).
3. Pursuant to Local Rule 56.3(b) of the Local Rules of the Northern District of Texas, PPB sets out the arguments and authorities and all other matters required by Local Rule 56.3(a) in its Brief in Support of Motion for Summary Judgment, filed concurrently with this Motion. All supporting evidence and material are contained in an Appendix of Evidence, also filed concurrently with this Motion.

WHEREFORE, for the foregoing reasons, PPB respectfully submits that it is entitled to summary judgment on its affirmative claim for breach of the guaranty against Hira, and therefore

should be awarded judgment in this case, in addition to all reasonable and necessary attorneys' fees and costs incurred in bringing this lawsuit.

Dated this 24th day of May, 2017.

Respectfully submitted,

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By: /s/ Robert P. Latham

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**ATTORNEYS FOR PLAINTIFF
PACIFIC PREMIER BANK**

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2017, true and correct copies of the foregoing were served on all parties of record via the electronic case filing notification system.

/s/ Lindsey E. Marsh

Lindsey E. Marsh